

Matthew J. Oppenheim (*pro hac vice*)
 Corey Miller (*pro hac vice*)
 Danae Tinelli (*pro hac vice*)
 OPPENHEIM + ZEBRAK, LLP
 4530 Wisconsin Avenue NW, 5th Floor
 Washington, DC 20016
 Telephone: (202) 480-2999
 matt@oandzlaw.com
 corey@oandzlaw.com
 danae@oandzlaw.com

Noel M. Cook, SBN 122777
 HANSON BRIDGETT LLP
 425 Market Street, 26th Floor
 San Francisco, California 94105
 Telephone: (415) 777-3200
 Facsimile: (415) 541-9366
 ncook@hansonbridgett.com

Jacob L. Tracer (*pro hac vice*)
 RECORDING INDUSTRY ASSOCIATION
 OF AMERICA
 1000 F St. NW, 2nd Floor
 Washington, DC 20004-1512
 Telephone: (202) 857-9611
 jtracer@riaa.com

Attorneys for Plaintiffs UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL
 RECORDS, LLC, CONCORD BICYCLE
 ASSETS, LLC, CMGI RECORDED MUSIC
 ASSETS LLC, SONY MUSIC
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER
 KAHLE, KAHLE/AUSTIN
 FOUNDATION, GEORGE BLOOD, and
 GEORGE BLOOD, L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**Declaration of Corey Miller in Support of
 Plaintiffs' Reply Memorandum of Law in
 Support of Plaintiffs' Motion for Leave to
 File the Second Amended Complaint**

I, Corey Miller, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner at Oppenheim + Zebak, LLP (“O+Z”), which represents Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, “Plaintiffs”) in the above-captioned matter.

2. I submit this declaration in support of Plaintiffs’ Reply to Defendants’ Opposition to Plaintiffs’ Motion for Leave to File the Second Amended Complaint (“Reply”). I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. The parties met and conferred on March 6, 2025 regarding Plaintiffs’ proposed amendment. At that conferral, I expressed that some of the infringements for which Plaintiffs seek to add claims occurred after Plaintiffs filed their original Complaint but before Plaintiffs filed their First Amended Complaint. I did not say that Plaintiffs had discovered those infringements before Plaintiffs filed their First Amended Complaint, because that is not correct.

4. Plaintiffs’ production of ownership and chain-of-title documents for works already in suit is substantially complete. From December 18, 2024 to February 19, 2025, Plaintiffs produced 929 documents, totaling 6,061 pages, relating to Plaintiffs’ ownership and chain of title for the works currently in suit.

5. At the parties’ March 6 meet-and-confer, I also stated that, had Defendants requested to see Plaintiffs’ proposed amended complaint or asked how many sound recordings Plaintiffs sought to add, Plaintiffs would have promptly provided that information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 27th day of March 2025.

/s/ Corey Miller

Corey Miller

Attorney for Plaintiffs